

SANTA MONICA MOUNTAINS CONSERVANCY

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August 27, 2007

Tom Glick, City Planner
Department of City Planning
Van Nuys Civic Center
14410 Sylvan Street, Room 351
Van Nuys, California 91401

**Notice of Preparation for the New Leaf Homes Draft Environmental Impact Report
ENV-2007-2769 EAF, City of Los Angeles**

Dear Mr. Glick:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Notice of Preparation for the New Leaf Homes Draft Environmental Impact Report in Laurel Canyon, ENV-2007-2769 EAF. The Conservancy has several suggestions and recommendations that should be included in the Draft Environmental Impact Report (DIER) regarding wildlife corridors, aesthetics, and biological resources.

The New Leaf Homes development (Project) site is severely constrained in terms of slope, geological stability, and road width. The current owners of the property were well aware of both the physical constraints of the project site and the development restrictions of the Mulholland Scenic Parkway Specific Plan when they acquired the property. Any development within the proposed Project site will result in significant biological and visual impacts. For this reason, the City is obligated to minimize the footprint and height of the proposed project. Any development greater than what the applicant is allowed by right is detrimental to public trust and to the Santa Monica Mountains' ecological and scenic resources. The proverbial need for housing in statements of overriding considerations must not apply in this constrained area.

The location of the Project is within an important wildlife corridor that connects the Laurel Canyon watershed to the Nichols Canyon watershed. The DEIR must show this land connectivity and related private parcels. The Project will significantly restrict wildlife movement unless it is redesigned. The only way to provide for permanent wildlife movement capability is to require a conservation easement through the Project site with a minimum width of 75 feet.

The Conservancy requests that the DIER include at least the following three economically feasible project alternatives to reduce ecological and visual impacts:

No Variances Or Exceptions Wildlife Corridor Alternative

This first alternative would not allow any variance for retaining walls, height, and setback requirements to any proposed or existing homes, and no exemptions to the Mulholland Scenic Parkway Specific Plan for any proposed and existing homes. This alternative would also include a conservation easement for the safe passage of wildlife.

Viewshed - Wildlife Corridor Protection Alternative

The second alternative would allow for limited variances and exemptions, depending on site specific conditions if the applicant demonstrated that such exemptions/variance specifically resulted in a meaningful cumulative decrease in visual and biological impacts. However, the number of homes as currently configured would be cut down to six houses - the five existing houses and one proposed development (see Figure 1). These affected lots would become irreversible conservation easements to preserve wildlife movement from the Laurel Canyon watershed to the Nichols Canyon watershed and ultimately to Griffith Park. That does not preclude more than six homes, it just mandates a clear wildlife movement path as shown on the attached map.

Compromise Viewshed - Wildlife Corridor Protection Alternative

The third alternative would be the same as the second alternative with the addition of a second proposed development (see Figure 2).

In addition to the conservation easements outlined in both alternatives, the conditions of approval should prohibit the construction of fences and other structures that may create barriers and obstructions to wildlife movement. Deer crossing signs should also be included as a mitigation measure for the safety of both motorists and wildlife.

The current configuration and proposed number of residences will further fragment wildlife habitat from impacts caused by potential brush clearance. The DEIR must analyze impacts from brushing on visual aesthetics, habitat loss, and erosion for all alternatives. The DEIR should also look at potential visual impacts to ridgelines and viewsheds that are visible from Mulholland Drive between Laurel Pass and Laurel Canyon Boulevard.

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Please direct any correspondence and questions to Paul Edelman, Deputy Director of Natural Resources and Planning, of our staff at the above address or by phone at (310) 589-3200, ext. 128. Thank you for your consideration of our recommendations and suggestions.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson